



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

www.Frontier.com

REDACTED FOR PUBLIC INSPECTION

July 24, 2012

BY HAND

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Frontier Communications Connect America Fund Phase I Acceptance

High-Cost Universal Service Support, WC Dkt. No. 05-337; Connect America Fund, WC Dkt. No. 10-90

Dear Ms. Dortch:

Frontier Communications Corp. hereby files the attached information in compliance with 47 CFR 54.312(b)(3), as adopted in the FCC's comprehensive order released November 18, 2011, reforming the federal Universal Service Fund (USF) and intercarrier compensation system.¹ These rules govern the procedures for price cap carriers accepting or declining support for broadband deployment under Phase I of the Connect America Fund ("CAF").²

Portions of this submission include confidential information that is filed pursuant to the Commission's September 16, 2010, *Protective Order* in this docket.³ Specifically, Frontier requests confidential treatment of the detailed census block and wire center information that Frontier provides as a guide to where it currently plans to deploy broadband.⁴ Frontier believes this information, if public, would provide its competitors an exact roadmap of a portion of Frontier's broadband expansion over the next three years. Such information is competitively sensitive because in addition

¹ See Connect America Fund, et al., W.C. Dkt. No. 10-90 *et al.*, *Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd. 17663, FCC 11-161 (rel. November 18, 2011) ("*Report and Order*").

² See *id.* at ¶¶ 128-55.

³ *In re: Developing a Unified Intercarrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future*, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, 05-337, GN Dkt. No. 09-51, *Protective Order*, DA 10-1749, 25 FCC Rcd. 13160 (rel. Sep. 16, 2010).

⁴ See Connect America Fund, et al., W.C. Dkt. No. 10-90 *et al.*, *Order*, DA 12-1155 (rel. July 18, 2012) (clarifying that the census blocks listed in a carriers' initial acceptance are not binding so long as the carrier meets its total deployment obligations and all deployments meet the CAF Phase I criteria for eligibility).

to providing very specific information about Frontier's deployment plans, it also necessarily indicates where Frontier will not be using the CAF Phase I money in its footprint. Competitors could exploit such information to their own gains in both operations and marketing.

The non-redacted portions have been marked as confidential. Frontier is also filing a redacted copy of this report for public inspection.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

Attachment

cc: Lynn Hewitt Engledow